

Exhibit B

Subject: RE: Dreher v. Experian: Motion to Quash Subpoena to Wiley Wilson
From: Joseph W Clark 07/11/2013 05:50 PM
To: Susan M. Rotkis
Cc: "Leonard Bennett", "Kristi Cahoon Kelly", "Patricia Simone Cruz", "Benjamin J Katz", "Hilary K Perkins"

I understand your position.

Our position has not changed. I am willing to discuss narrowing the subpoena with you and counsel for Wiley Wilson, together. In our call, I stated as much. Regardless, I have reviewed the subpoena and am prepared to have a discussion regarding scope.

Frankly, I am having difficulty understanding the problem with my request that counsel for Wiley Wilson be on the call.

That said, if you are rejecting my invitation to discuss then I will await your motion and respond to it as required by the rules.

Regards,
Joe

This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.

----- Original Message -----

From : "Susan M. Rotkis" <srotkis@clalegal.com>
To : Joseph W Clark <jwclark@JonesDay.com>
Cc : Leonard Bennett <lenbennett@clalegal.com>, Kristi Cahoon Kelly <kkelly@siplfirm.com>, Patricia Simone Cruz <psacruz@jonesday.com>, Benjamin J Katz <bjkatz@jonesday.com>, Hilary K Perkins <hperkins@jonesday.com>
Sent on : 07/11 04:56:31 PM EDT
Subject : Re: Dreher v. Experian: Motion to Quash Subpoena to Wiley Wilson

Joe:

We have already met and conferred on this issue, Joe. When we left off, you suggested you would get back to us within a day on how you would narrow the subpoena. If you do not see a way to withdraw or narrow the subpoena, we intend to move to quash and I have so indicated to counsel for Wiley Wilson. Susy

On Jul 11, 2013, at 4:45 PM, Joseph W Clark wrote:

Thanks for your email.

We will not withdraw the subpoena but are willing to discuss possible ways to narrow the request.

Wiley Wilson should be a part of any such discussion.

Have you spoken with counsel for Wiley Wilson?

Joe

This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.

----- Original Message -----

From : "Susan M. Rotkis" <srotkis@clalegal.com>
To : Joe Clark <jwclark@JonesDay.com>
Cc : Leonard Bennett <lenbennett@clalegal.com>, Kristi Cahoon Kelly <kkelly@sipfirm.com>
Sent on : 07/11 04:03:38 PM EDT
Subject : Dreher v. Experian: Motion to Quash Subpoena to Wiley Wilson

Dear Joe:

When last we talked, you were going to get back to us on whether you will withdraw or substantially narrow your subpoena to Wiley/Wilson. Susy Susan M. Rotkis, Esq.
Consumer Litigation Associates, P.C.
763 J. Clyde Morris Blvd. 1-A
Newport News, VA 23601
(757) 930-3660
(757) 930-3662 facsimile

This message contains information from Consumer Litigation Associates, Inc. which may be confidential and privileged. If you are not an intended recipient and have received this transmission in error, please contact (757) 930-3660 to report same.

Susan M. Rotkis, Esq.
Consumer Litigation Associates, P.C.
763 J. Clyde Morris Blvd. 1-A
Newport News, VA 23601
(757) 930-3660
(757) 930-3662 facsimile

This message contains information from Consumer Litigation Associates, Inc. which may be confidential and privileged. If you are not an intended recipient and have received this transmission in error, please contact (757) 930-3660 to report same.